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Attorneys for Defendant
ROCKRIDGE MANOR HOMEOWNERS' ASSOCIATION

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE CHANG, individually and as Guardian
ad Litem for ERIC SUN, disabled

Plaintiffs,

v.

ROCKRIDGE MANOR CONDOMINIUM,
ROCKRIDGE MANOR HOMEOWNERS ASSO;
ROCKRIDGE MANOR BOARD OF DIRECTORS;
ROCKRIDGE MANOR PRESIDENT OF BOARD
OF DIRECTORS CHARLES BLAKENEY;
ROCKRIDGE MANOR MANAGER EVA
AMMANN; TRUCK INSURANCE EXCHANGE;
AND DOES 1-30, inclusive,

JOINDER

UNIVERSITY OF CALIFORNIA BERKELEY; UC
BERKELY CHANCELLOR ROBERT
BIRGENEAU; UC BERKELEY PUBLIC
RECORDS COORDINATOR ALAN KOLLING;
UC BERKELEY GENERAL COUNSEL SUSAN
VON SEEBURG; UC BERKELEY POLICE
DEPARTMENT CHIEF VICTORIA HARRISON;
UC BERKELEY POLICE DEPARTMENT
LIEUTENANT ADAN TEJADA; UC BERKELEY
POLICE DEPARTMENT MANAGER TOM
KLATT; UC BERKELY POLICE DEPARTMENT
DISPATCHER CONSTANCE PEPPERS CELAYA;
and DOES 31-60, inclusive,

JOINDER

PAMELA ZIMBA, ATTORNEY AT LAW;
ALBERT COOMBES, ATTORNEY AT LAW; and
DOES 61-90, inclusive,

Defendants

Case No.: C07-4005 EMC

**NOTICE OF MOTION AND MOTION
OF DEFENDANT ROCKRIDGE
MANOR HOMEOWNERS'
ASSOCIATION FOR SUMMARY
JUDGMENT**

Date:

Time:

Room: C

Judge: Magistrate Judge Edward M. Chen

**NOTICE OF MOTION AND MOTION OF DEFENDANT
ROCKRIDGE MANOR HOMEOWNERS' ASSOCIATION FOR
SUMMARY JUDGMENT**

1 TO PLAINTIFFS IN PROPRIA PERSONA:

2 PLEASE TAKE NOTICE that defendant ROCKRIDGE MANOR HOMEOWNERS'
3 ASSOCIATION ("Rockridge Manor"), hereby moves and will move the court on the date, time and
4 place set forth above to enter summary judgment in favor of defendants Rockridge Manor
5 Homeowners' Association, "Rockridge Manor Condominium," "Rockridge Manor Board of
6 Directors," "Rockridge Manor president of Board of Directors, Charles Blakeney" and Charles
7 Blakeney. This summary judgment motion is based upon the indisputable fact that all of plaintiffs'
8 claims are barred by the dismissal with prejudice, order approving compromise and the release
9 executed by plaintiffs in that Alameda County Superior Court Action # 2001-023364, entitled
10 Christine Change, et al. v. Eva Ammann, et al.

11 This motion is based on this notice of motion and motion, the memorandum of points and
12 authorities filed herewith, the declaration of Paul A. Conroy, defendant's request for judicial notice
13 filed herewith, the pleadings and papers filed herein, and on such other matters as may be brought to
14 the attention of the court and the parties at or before the hearing on this motion.

15 Dated: November 2, 2007

ALLMAN & NIELSEN, P.C.

16
17 By:  Paul A. Conroy

18 Paul A. Conroy

19 Attorney for Defendant

20 ROCKRIDGE MANOR

HOMEOWNERS' ASSOCIATION

PROOF OF SERVICE

I am a citizen of the United States and employed in Marin County, California. I am over the age of eighteen years and not a party to the within action. My business address is 100 Larkspur Landing Circle, Suite 212, Larkspur, California 94939-1743.

On this date I served the foregoing documents described as:

**NOTICE OF MOTION AND MOTION OF DEFENDANT ROCKRIDGE MANOR
HOMEOWNERS' ASSOCIATION FOR SUMMARY JUDGMENT**

on the interested parties in the action by placing [] the original [x] a true copy thereof, enclosed in a sealed envelope addressed as follows:

Christine Chang
341 Tideway Drive #214
Alameda, CA 94501
Telephone (510) 769-8232

Pro Se, individually and as Guardian ad Litem
for ERIC SUN, disabled

Gaylyn Kim Conant
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Attorney for Defendants
THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA, ROBERT BIRGENEAU,
CONSTANCE PEPPERS CELAYA, ADAN
TEJADA, VICTORIA HARRISON, ALLAN
KOLLING, TOM KLATT AND SUSAN VON
SEEBURG

Lee J. Danforth
Coddington Hicks & Danforth
555 Twin Dolphin Drive Suite 300
Redwood City CA 94065
Telephone: (650) 592-5400

[x] **BY E-MAIL:** I transmitted a true electronic copy of the foregoing documents by e-mail to Christine Chang's e-mail address: Christie1chang@peoplepc.com, Gaylyn Kim Conant's email address: gkc@llcllp.com, and Lee Danforth's email address: LDanforth@CHDLAWYERS.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on November 2, 2007, at Larkspur, California.


/s/ Paul A. Conroy
PAUL A. CONROY